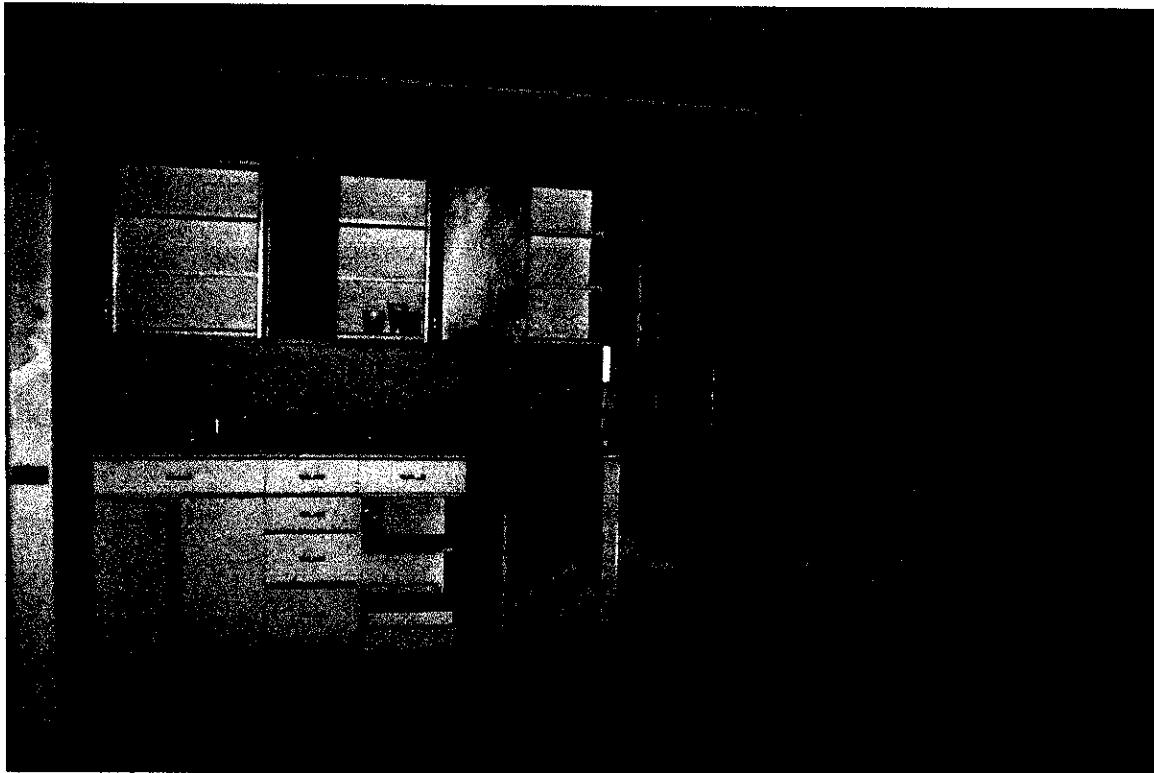
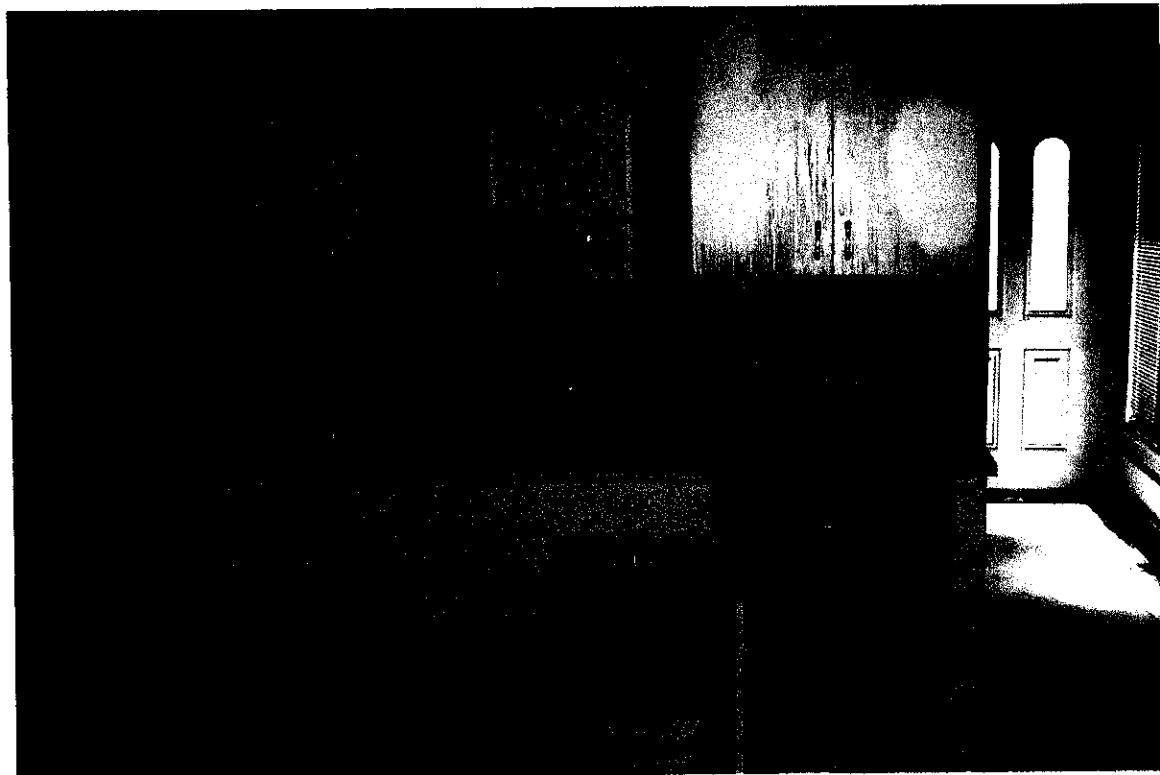
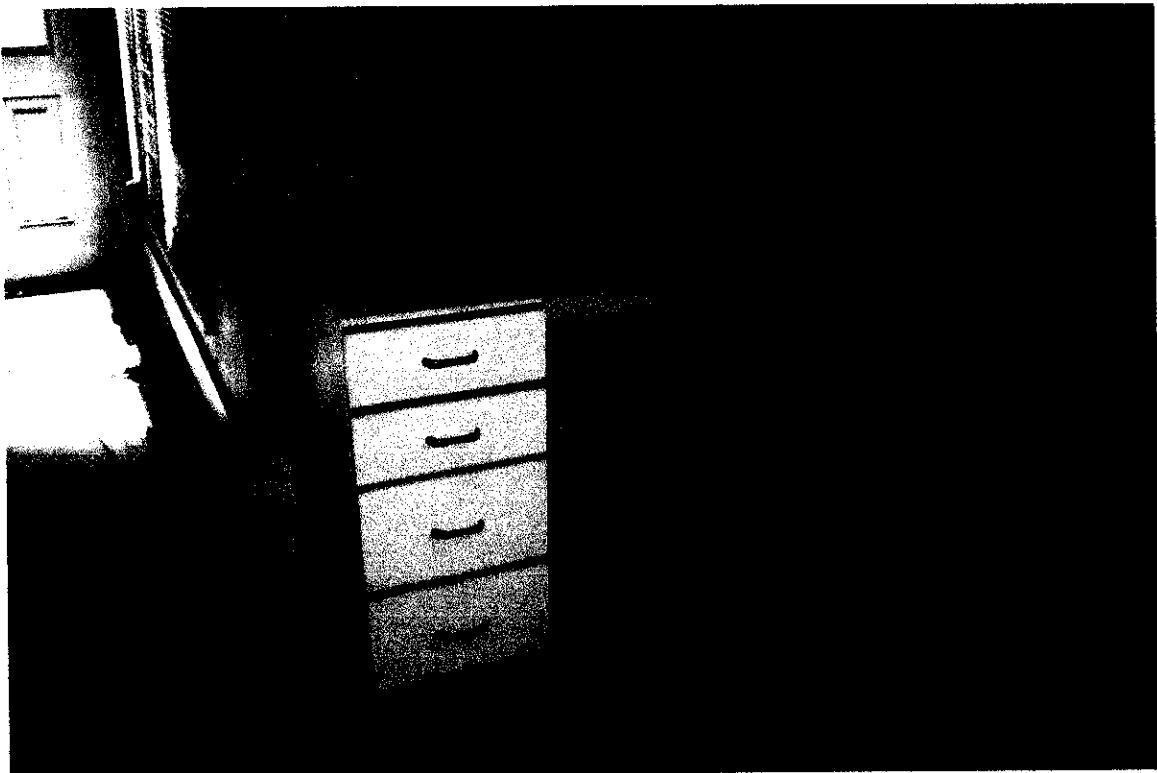
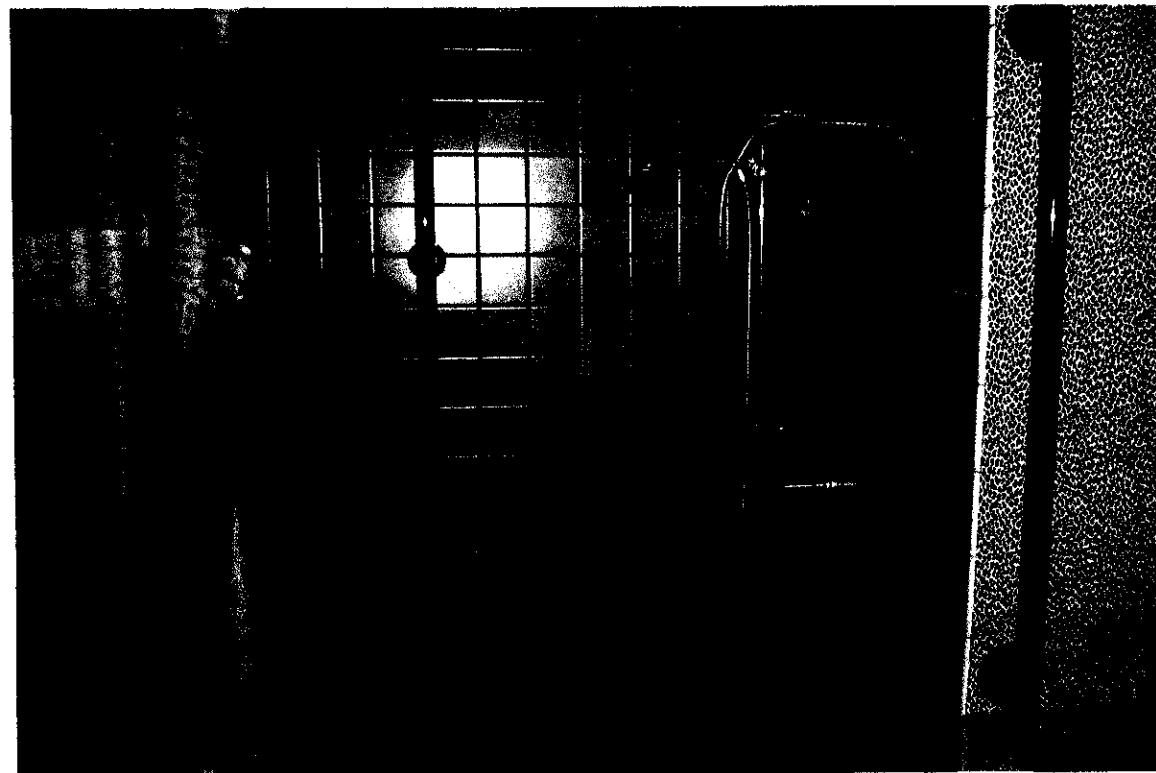
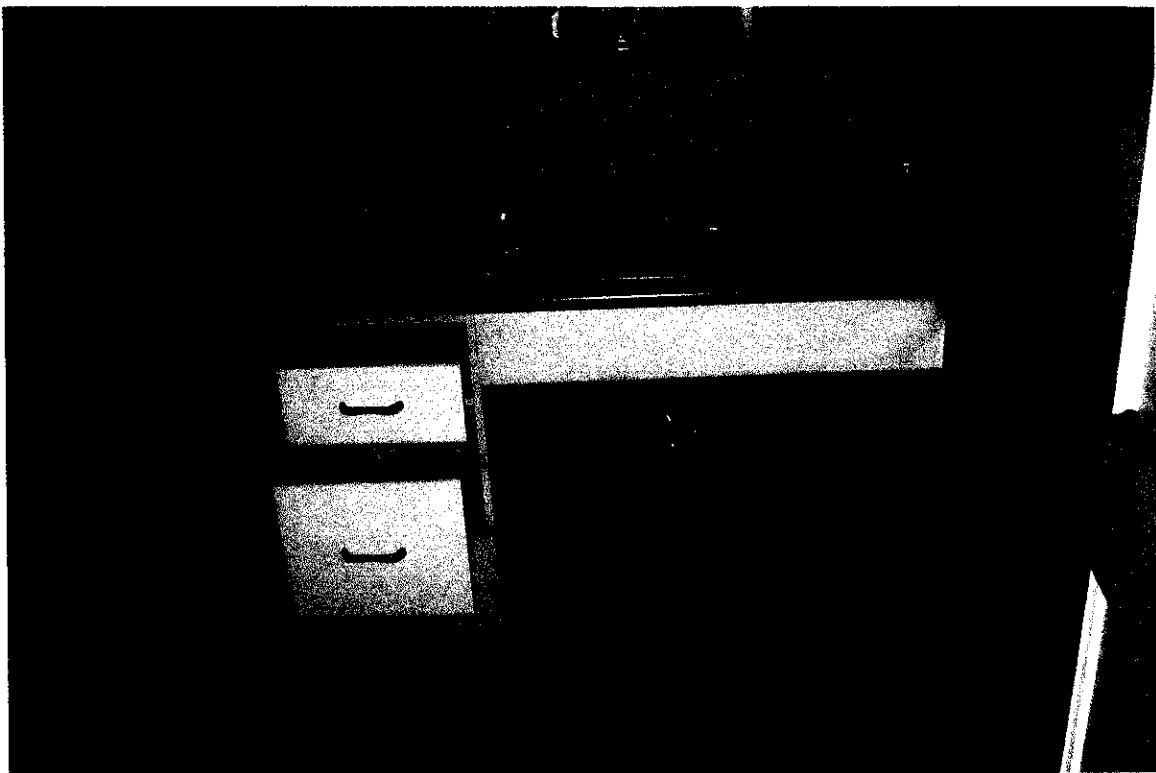
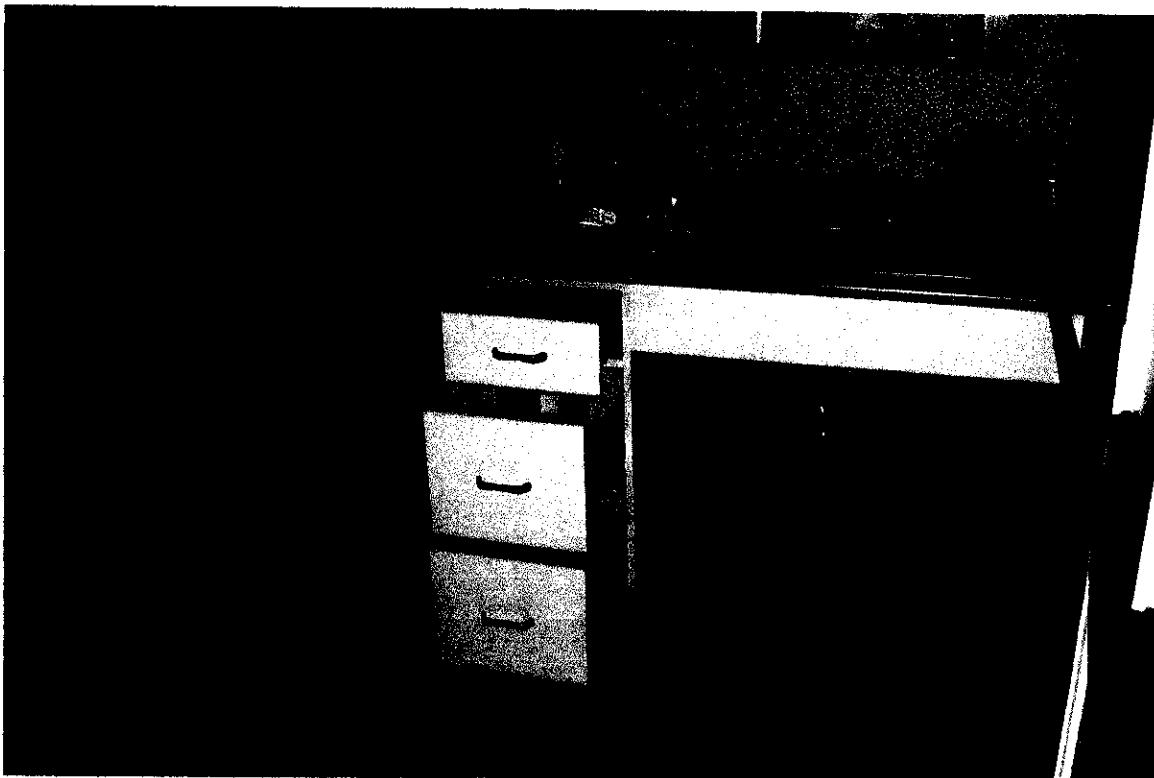


**HANDICAP
SUITE**











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G.S. JONES AND SONS
CONSULTANTS - GENERAL CONTRACTORS

November 13, 2003

Mr. David J. Bennett
 Amica Mutual Insurance Company
 2 Penn Center West, #301
 Pittsburgh, PA 15276-0102

Re: Jonathan & Amy Borden
 4838 Wolf Road
 Erie, PA 16505

Dear Mr. Bennett:

The following is in response to a letter that was prepared by Mr. Anthony Parise (Giordano Associates, Inc.) and sent to Attorney Terry Jones (Macdonald, Illig, Jones & Britton), in which Mr. Parise addresses several areas of concern based on his review of my estimate.

I met with Mr. Parise and yourself at the site on November 3, 2003, in order to inspect and discuss these listed items. At that time, Mr. Parise stated that he was in agreement with the scope and cost of my estimate, subject to resolution of these areas of concern, and that he is in agreement with using my estimate as the basis for both the scope and cost of repairs subject to these items.

Based on a review of my estimate dated July 28, 2003, and the above referenced site inspection, I will address each item in order as they are presented in the letter.

Basement - General

1. The sump pit is a clay tile pit imbedded in concrete. No additional costs are required other than those listed on page 3, area 4, line 8, and page 30, area 38, line 1 of my estimate.

Additional Cost Recommended: \$0

2. Deodorizing sealant of the floor is identified on page 1, area 1, lines 10 & 14. The epoxy coat specified on page 3, area 4, line 9 is to provide a finished

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 E-Mail: gjonesandsons@gjonesandsons.com www.gjonesandsons.com

AM207

floor surface in the "unfinished" portion of the basement. No additional deodorization work will be required.

Additional Cost Recommended: \$0

3. Locksets and hardware for these doors are included in the door unit cost.

Additional Cost Recommended: \$0

Left Front Basement - Finished

1. See item 2 under "Basement General"

Additional Cost Recommended: \$0

Crawl Spaces

1. These vapor barriers should be replaced.

Additional Cost Recommended: \$516.04
(Cost includes Overhead & Profit)

2. The cost of smoke detectors is included in the Young Electric and TSI estimate.

Additional Cost Recommended: \$0

Steps to Kitchen

1. The subflooring is included on page 4, area 6, line 4.

Additional Cost Recommended: \$0

2. There is no oak flooring on the landing.

Additional Cost Recommended: \$0

3. The base trim on the landing is included on page 4, area 6, line 10.

Additional Cost Recommended: \$0

4. See item 3 same section.

Additional Cost Recommended: \$0

5. The wall insulation in this area should be added.

Additional Cost Recommended: \$92.92

Kitchen

1. A two piece base trim is included on page 5, area 7, line 16.

Additional Cost Recommended: \$0

2. My estimate includes the pine cover and is listed on page 5, area 7, line 20.

Additional Cost Recommended: \$0

3. The cased opening is included on page 11, area 14, line 11.

Additional Cost Recommended: \$0

4. Scaffolding is included in the various unit costs and on page 30, area 39, line 3 as a general item.

Additional Cost Recommended: \$0

5. The skylight chase painting should be added.

Additional Cost Recommended: \$60.50

6. The cabinet pricing includes all countertops (Beveled Edge Corian).

Additional Cost Recommended: \$0

7. Appliances were not included except for the island cook unit (page 5, area 7, line 34).

Additional Cost Recommended: \$5,989.17

Oven	\$1,524.58
Refrigerator	\$3,075.00
Dishwasher	\$797.37
Water Purifier	\$220.22
Microwave	\$372.00

8. The kitchen sink is included on page 5, area 7, line 32.

Additional Cost Recommended: \$0

9. Child latches should be added to the cabinet pricing.

Additional Cost Recommended: \$145.20

10. The cost of sizing is included in "seal/prime" walls on page 5, area 7, line 15.

Additional Cost Recommended: \$0

11. The crown molding for cabinetry is included in the cabinet pricing.

Additional Cost Recommended: \$0

12. The curtain rod installation in this area is a contents item.

Additional Cost Recommended: \$0

13. The locksets are included in the door pricing.

Additional Cost Recommended: \$0

14. See item 8 in this section.

Additional Cost Recommended: \$0

Mudroom

1. The framing for this electrical closet was missed.

Additional Cost Recommended: \$63.88

2. Pricing for the two piece base trim is included.

Additional Cost Recommended: \$0

3. Locksets are included in the door pricing.

Additional Cost Recommended: \$0

4. Heat registers are included in the ductwork pricing listed on page 29, area 37, line 2.

Additional Cost Recommended: \$0

5. The cost of bi-fold doors is included on page 6, area 8, line 11.

Additional Cost Recommended: \$0

6. The exterior doors are included on page 6, area 8, lines 12 & 13.

Additional Cost Recommended: \$0

7. The cost of closet shelving should be added.

Additional Cost Recommended: \$152.46

Powder Room

1. The cost of wallpaper should be added. The cost of ceramic tile walls (included by error in my estimate) should be deducted.

Additional Cost Recommended: (\$800.59)

2. The cost of the two piece base trim is included.

Additional Cost Recommended: \$0

3. See Mudroom item #4.

Additional Cost Recommended: \$0

4. There is no medicine cabinet.

Additional Cost Recommended: \$0

5. Locksets are included in the door costs.

Additional Cost Recommended: \$0

Garage

1. The slab-on-grade construction allows the use of partial sheet rock in this area (no smoke source from below).

Additional Cost Recommended: \$0

2. The garage door will be painted, see page 8, area 10, line 8.

Additional Cost Recommended: \$0

3. The cost of texture painting the ceiling should be added.

Additional Cost Recommended: \$310.24

4. The closet doors can be successfully cleaned and sealed for odor and appearance see page 7, area 10, line 3.

Additional Cost Recommended: \$0

5. The shelving should be cleaned and sealed.

Additional Cost Recommended: \$169.40

6. The exterior door should be painted.

Additional Cost Recommended: \$54.45

Studio

1. See kitchen item 4 for scaffolding.

Additional Cost Recommended: \$0

2. The costs include replacing and finishing the beam cover (pine) on page 9, area 12, line 25 & 26.

Additional Cost Recommended: \$0

3. Included, see Mudroom item #4.

Additional Cost Recommended: \$0

Sewing Room

1. There is no wallpaper border.

Additional Cost Recommended: \$0

2. The allowance for this closet package should be increased.

Additional Cost Recommended: \$290.40

Family Room

1. The allowance for the door and two casements should be increased.

Additional Cost Recommended: \$121.00

2. Pricing for the sink should be added.

Additional Cost Recommended: \$453.75

Dining Room

1. The wall pricing should be increased.

Additional Cost Recommended: \$399.30

- a) The bracing requirement is included on page 1, area 1, line 3.

Additional Cost Recommended: \$0

2. There is no cased opening.

Additional Cost Recommended: \$0

Entrance Hall

1. The mural wall cover is included on page 14, area 17, line 18. (This is not hand painted)

Additional Cost Recommended: \$0

2. The door bell is included in the Young Electric bid.

Additional Cost Recommended: \$0

Rear Exercise Room

1. This door can successfully be painted.

Additional Cost Recommended: \$0

2. Drapes were not included (as contents) and will require replacement.

Additional Cost Recommended: \$490.05
(Parise allowance)

3. Smoke detector replacement is included.

Additional Cost Recommended: \$0

4. Heat registers are included.

Additional Cost Recommended: \$0

5. These windows should clean, stain, and seal successfully. The cost for additional detail work should be added.

Additional Cost Recommended: \$338.80

Exercise Room Bathroom

1. Underlayment will be required for the floor tile.

Additional Cost Recommended: \$54.45

2. Shower rods were considered contents and not included in my original estimate.

Additional Cost Recommended: \$72.60

3. Cleaning of the faucet is included.

Additional Cost Recommended: \$0

4. Cleaning of the commode is included.

Additional Cost Recommended: \$0

Right Rear Bedroom

1. This door can be painted.

Additional Cost Recommended: \$0

2. The base and cove cost needs to be increased.

Additional Cost Recommended: \$498.52

3. The draperies were not included in my original estimate (contents).

Additional Cost Recommended: \$490.05
(Parise Allowance)

Common Area

1. This door can be painted.

Additional Cost Recommended: \$0

2. This amount does need to be increased for base work.

Additional Cost Recommended: \$342.76

3. The drapes were not included in my original estimate.

Additional Cost Recommended: \$326.70
(Parise Allowance)

Common Bath

1. The bathroom walls that are tiled can be successfully exposed by replacing common wall drywall in other areas and deodorized from behind. Closed walls will not release trapped odor if any exists.

Additional Cost Recommended: \$0

2. The cleaning of the commode is included.

Additional Cost Recommended: \$0

Steps to Second Floor

1. Partial wall replacement will work successfully in this area.

Additional Cost Recommended: \$0

2. These windows are painted and in good condition. They can be successfully reused.

Additional Cost Recommended: \$0

3. There is a border that requires replacement.

Additional Cost Recommended: \$60.55

4. Scaffolding is included.

Additional Cost Recommended: \$0

Right Side Bedroom

1. There is no border.

Additional Cost Recommended: \$0

2. This floor may require replacement.

Additional Cost Recommended: \$1,692.45

Master Bedroom

1. These walls are a sponge finish and require additional cost for handwork.

Additional Cost Recommended: \$272.13

2. A wallpaper border must be added.

Additional Cost Recommended: \$156.09

3. Draperies were not included (as contents) and will require replacement.

Additional Cost Recommended: \$490.05

4. The French doors were included on page 23, area 29, line 23, 24, and 25.

Additional Cost Recommended: \$0

Master Bath/Vanity

1. The top is 6' long. Below is a 30" base cabinet and drawer unit. The cost presented on page 24, area 29, line 23, 24, 25 and 26 is adequate.

Additional Cost Recommended: \$0

Master Bathroom

1. Underlayment will be required.

Additional Cost Recommended: \$133.10

2. The commode cleaning is included.

Additional Cost Recommended: \$0

3. All bath accessories are included.

Additional Cost Recommended: \$0

Hall Bath

1. Underlayment will be required for the floor tile.

Additional Cost Recommended: \$36.50

Electrical

1. The nurse call wire and device is included.

Additional Cost Recommended: \$0

Plumbing

1. Fixtures are included throughout the estimate.

Additional Cost Recommended: \$0

Miscellaneous

1. I assumed that a toilet facility would be set up within the home for rough use during the course of the job. If this is not acceptable, add a port-a-john.

Additional Cost Recommended: \$726.00

2. Tax is included in unit cost pricing.

Additional Cost Recommended: \$0

3. Millcreek Township (814-833-1111) requires no construction permit or inspections for repair work. Only new construction or additions require permits for residential work. No additional architectural or engineering is required.

Additional Cost Recommended: (\$1,000.00)

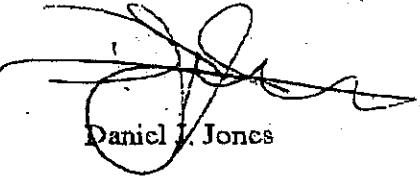
Summary of Potential Cost Changes

- **Addition** \$7,858.62
For items originally not included as contents items
(i.e., appliances, drapes, blinds, etc.)

• Addition for construction increases	\$7,140.69
• Reduction for construction decreases	<u>(\$1,800.59)</u>
Net Increase (Includes Overhead & Profit)	\$13,198.72

If you need any additional information for this project, please do not hesitate to contact me at my office.

Sincerely,



Daniel J. Jones



G.S. JONES AND SONS
CONSULTANTS • GENERAL CONTRACTORS

June 6, 2005

Mr. Paul Geer
DiBella & Geer
312 Boulevard of the Allies, 3rd Floor
Pittsburgh, PA 15222

Re: Jonathan & Amy Borden
4838 Wolf Road
Erie, PA 16505

Dear Mr. Geer,

The following is a broad based review of the differences between the G.S. Jones and Sons (G.S.J.) base estimate and the base estimate provided by Mr. Schuman of Property Claims Services (P.C.S.), for fire damage repairs at the above referenced address.

As you know, the P.C.S. estimate total was \$328,999.14 and the G.S.J. estimate was \$542,598.42. As initially presented, the P.C.S. estimate was approximately 39% lower than the G.S.J estimate. The owners' representative, Mr. Parisi of Giordano Associates, Inc. (G.A.I.) presented an initial estimate of \$691,117.08 which, in comparison to the G.S.J. estimate, is 27% higher. As illustrated, depending upon the individual approach to the loss and initial assumptions with regard to salvageable versus non salvageable items, the difference in cost can vary widely either way.

In reviewing the P.C.S. estimate, the overriding element that created the most difference between the P.C.S. estimate and the G.S.J. estimate was the assumption by P.C.S. that many of the fixtures, cabinets, windows, and etc. could be cleaned and restored to their pre-loss condition versus their replacement.

This assumption is a logical first approach and would require the actual cleaning of the various components to make the final determinations. This approach is used in many losses with the provision that items that do not successfully clean will be replaced (with the cleaning charges to be included as well).

At the time that I was brought into the loss, a number of things influenced my decision to replace rather than clean many of the components.



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1. As stated in my report, the home was in excellent condition. Some homes, offices, and structures are older and have been subjected to wear, deterioration, discoloration, and etc. In these cases, a thorough cleaning, decontamination, and deodorization may be sufficient. Any remaining slight discoloration may not be noticeable and a thorough cleaning may actually result in a betterment in certain instances.
2. I was told by Mr. Parisi that a child with respiratory problems was living in the residence. Residues from smoke can off-gas for a period of time and the concern for young children, especially with a respiratory condition, is heightened; especially in today's litigious climate.
3. The home was remodeled to accept a handicapped individual. This remodeling increases the likelihood that even if the current owner was not to re-occupy with their compromised child, the potential for a new owner with a health condition is heightened, as is the overall concern with regard to air quality.
4. Because of the extreme heat and burn time in the basement, hot gasses were able to penetrate throughout the crawlspace below the far end of the home and drive up into sub-surfaces, stud cavities (via wire holes), and duct cutouts. The hotter the fire, the greater the pressure, and smaller the residue particles, allowing more extreme penetration of cracks, cavities, and areas difficult to clean.
5. The cleaning of the residence was a contentious issue that I was aware of from the beginning. As such, I spent a great amount of time and effort to investigate the possibility of cleaning versus replacement. Even still, the decision to replace rather than clean was not an obvious one and experts would disagree depending on their area of specialty.

This decision to replace, versus clean, affected the entire estimate to a significant degree and increased the cost of doors, windows, ceramic tile, fixtures, hardwood floors (pre-finished), plumbing, cabinetry, etc. This element contributed the most to the difference in cost.

Another factor that influenced the cost was my initial contact with the individual who installed the cabinets. Early on I was aware that the cabinets were high end custom cabinets, and that there was a significant disagreement in cost. As a result, rather than applying traditional lineal foot costs to the cabinetry, I had my cabinet supplier provide me with comparable cabinet pricing to duplicate the various components throughout the house. Also, I was provided with information regarding cabinetry that was located in the basement, which essentially had burned out of sight. If this issue had not been at the forefront, I could have easily missed these units.

I was also informed early on that there was a concern about the structural integrity of the masonry which I paid special attention to during my investigation. Replacement, versus

repair and cleaning of elements of the masonry, was a judgment call which, again, could be subject to the opinion of the investigator and or engineer.

Lastly, the decision to remove drywall in order to evaluate and treat sub wall cavities was a difficult one. In most cases these cavities can be successfully treated and deodorized through access ports without wide area removal. In this case, the decision to replace was based on the presence of the child with respiratory problems, the layout of the space as handicap accessible, and the hot driving nature of the fire.

Once again experts will disagree on this issue depending upon conditions present and the specialty of the investigator.

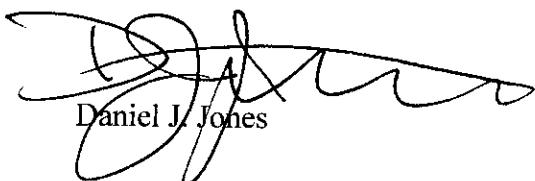
In summary, the primary difference between the G.S.J. estimate and the P.C.S. estimate is the decision to replace drywall walls and various building components versus the cleaning, sealing, and deodorization of these stud cavities and components.

The decision to replace versus clean was a difficult one and it is unknown to this date whether or not a cleaning process would have been successful. The technology available in today's restoration field has advanced to the point where the salvage of materials through the various restoration techniques is highly successful. However, because of the compromised health of the child in residence, the final decision to replace versus clean, seal, and deodorize was made.

This concludes my report.

If you have any questions or need any additional information, please do not hesitate to contact me at my office.

Sincerely,



Daniel J. Jones